

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

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United States of America

v.

Alkis Nakos

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No: 1:14-cr-00093-LM

**MOTION FOR SERVICES OTHER THAN COUNSEL:**  
**INTERPRETER**

NOW COMES the Defendant, Alkis Nakos, by and through his counsel, Robert S. Carey, Orr & Reno, P.A., and moves this Court to issue an order authorizing an expenditure of government funds in the amount of \$1,100.00 to retain the services of an interpreter for the following reasons:

1. In the course of its investigation, law enforcement intercepted telephone conversations between Mr. Nakos and his co-defendant, Mr. Koustas, and others. Several of these conversations were in Greek. Some of the conversations were translated by law enforcement.
2. Counsel seeks to hire a Greek interpreter through the Language Bank, at 340 Granite Street, in Manchester, so that he may confirm the accuracy of the translated conversations, and have translated other intercepted conversations. The Language Bank charges an hourly rate of \$55.00 for the services of its interpreter. Counsel estimates that the interpreter will need approximately 20 hours to translate certain intercepted conversations.

3. The request for \$1,100 for an interpreter is reasonable.
4. Mr. Nakos cannot afford to hire an interpreter. His assets have been seized in forfeiture action filed by the Government.
5. Under 18 U.S.C. § 3006A(e)(1), the Court may approve funds for an expert, such as an interpreter.
6. In addition, due process and the right to effective assistance of counsel require that an indigent defendant be provided with funding for services other than counsel.<sup>1</sup> Equal protection also requires that an indigent defendant be provided with the tools for an adequate defense or appeal, when these tools are available for a price to other defendants.<sup>2</sup>
7. The Government, through AUSA Terry Ollila, assents to this Motion.

WHEREFORE, Mr. Nakos respectfully requests the Court to issue an order, providing that:

- A. He is authorized to expend funds in the amount of \$1,100.00 to hire an interpreter; and,
- B. Grant such other and further relief as is just and equitable.

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<sup>1</sup> See *Ake v. Oklahoma*, 470 U.S. 68, 78-79 (1985).

<sup>2</sup> See *Britt v. North Carolina*, 404 U.S. 226, 235 (1971).

Respectfully submitted,

ALKIS NAKOS

By his Attorneys,

Dated: January 14, 2015

/s/ Robert S. Carey  
Robert S. Carey, NH Bar #11815  
ORR & RENO, P.A.  
45 S. Main Street, Suite 400  
P.O. Box 3550  
Concord, NH 03224-3550  
(603) 224-2381

CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2015, a copy of the within Motion was Electronically Served upon all counsel of record and Conventionally upon Alkis Nakos.

/s/ Robert S. Carey  
Robert S. Carey, NH Bar #11815

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